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Samuel A. Simon

March 12, 1996

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

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SUBJECT: CC Docket No. 94-102

Reply Comments of the Ad Hoc Alliance for Public Access to 911 Concerning the "Consensus Agreement"

Dear Mr. Secretary:

Attached hereto is the one-page Appendix to the reply comments of the Ad Hoc Alliance for Public Access to 911's which were filed yesterday in the above proceeding. The filing noted that the attached one page article would be appended but we inadvertently failed to attach the article.

We request that this be added to the filing. We believe no one will be prejudiced by the late submission and request that it be accepted and appended to our filing.

Sincerely,

Samuel A. Simon Counsel to the Alliance Ad Hoc Alliance for Public Access to 911 901 15th Street, NW Suite 120 Washington, DC 20005

Attachment

Month Cold Y

# CROUSII: GPS

### Location, wireless technologies merge for business and safety

By Linda Kay Sakelaris

Location technology is taking its place in the wireless communications industry as Global Positioning System products begin to mesh with radio and cellular networks, spawning several potentially lucrative businesses

A system of 24 satellites launched by the U.S. Department of Defense begraning in the late 1980s provides every spot on earth with a precise address. The satellites arout the planet twice a day transmitting latitude, longitude and altitude information.

The GPS constellation was developed for U.S. military purposes but national policy requires that excess capacity be offered worldwide. No user fees are required.

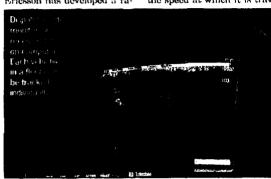
Anyone with a GPS receiver can acquire position information for business applications including surveying, mapping, aviation, navigation. transportation and more. Commercial GPS is a large and growing market expected to reach \$5 billion in annual equipment sales by 2000, according to Magellan Systems Corp. Other analysts predict the success of the technology will be even greater.

Not all companies interested in location tracking are using GPS. Some firms are inunching their own satellite systems to do vehicle tracking, pipeline monitoring and other such applications

Those are the same functions offered by many of the GPS products now entering the wireless marketplace.

In fleet tracking, GPS receivers peg the location and radio or cellular systems route the information to command centers for monitoring. Sweden-based radio manufacturer L.M., Ericsson jumped into vehicle location systems last year when it teamed with Trimble Naviga-

tion Ltd. Sunnyvale, Califbased Trimble manufactures GPS receivers and tracking display software products that work with Ericsson's Enhanced Digital Access Communications radio system. Ericsson has developed a rathe work. Dispatchers flip through the Windows-driven programs, clicking on ambulance icons moving across grids and maps. In 20 seconds, they know the precise location of every ambulance, the speed at which it is trav-



dio data interface to give users a plug-and-play connection, eliminating the need for custom hardware or software.

The ability to incorporate AVL into a true voice or data trunking architecture allows agencies to use radio bandwidth more efficiently, as well as obtain real-time vehicle location information," said Tom Ellis, Trimble's vice president of tracking products.

American Medical Response of Colorado said it eliminated a great deal of its voice radio traffic by switching to a GPS system. AMR began constructing the system last November, first by dedicating a portion of its 800 MHz frequency to GPS, then by moving a repeater from the downtown Denver area north to El Dorado Mountain in Boulder, Colo.

"On the roofs of its 43 ambulances, AMR is installing GPS receivers about the size and shape of a sand dollar," said Paul Smith, AMR director of communications. Inside the vehicles, AMR has placed a Trimble GPS brain or status head device.

"We also have 800-band Uniden radios that work as frequency generators for GPS tracking. They have a fast attack time and pick up the frequencies to El Dorado. We poll five ambulances every second," he said.

A Computer Aided Dispatch program at the Denver command center does the rest of eling and more. To dispatch an ambulance to an emergency, the command center sends the call to the vehicle's GPS brain, which contains a liquid crystal display screen. Just about every touch of the brain's button updates the vehicle's location, communicating its status in relation to the accident, Smith said.

"You can use GPS receivers and bundle different applications with that service, delivering the data collected through the circuit-switched network to a central location."

GPS also is used in paging and two-way radio networks to provide timing for simulcasting—broadcasting the same RF information on the same RF channel over multiple transmitters across vast geographic areas.

Charlotte, N.C.-based Glenayre Technologies Inc. offers a controller that uses GPS for high-speed simulcasting in paging networks. Ericsson Private Radio Systems in Lynchburg, Va., also has designed a simulcast product using GPS for two-way, public safety radio systems, which it plans to beta test in this year's second quarter. "GPS is a highly accurate timing source," said Walt Sedlazek, Ericsson's simulcast product manager. "With GPS, we are able to time stamp signals between the centralized source and remote sites, to compensate for the delay that typically occurs with the leased T-1 network."

Cellular operators can offer their analog networks for vehicle location service using one of several GPS products, including Trimble's GPS/Cellular Messenger system.

The device provides cellular operators with a way to sell economical fleet management applications. The Wireless Data Division of AT&T Wireless Services is working GPS receivers and the data network.

"You can use GPS receivers and bundle different applications with that service, delivering the data collected through the circuit-switched network to a central location," said Andy Willett, business services marketing manager for AT&T Wireless Data

The Messenger can be installed in any vehicle and supports a variety of data devices. GPS and cellular components are housed together, including an integral microcontroller. The Messenger can transmit GPS timing data as well as location information.

U.S. auto manufacturers are jumping into the act with on-vehicle GPS devices that integrate with the car's cellular phone. General Motors will offer the OnStar system on its 1997 Cadillacs later this year. The product integrates advanced vehicle electronic architecture with GPS and a cellular phone. OnStar links the vehicle with the On-Star customer assistance center for roadside assistance, emergency services, routing and location help.

Ora Electronics is promoting a GPS Telepath system, which plugs navigation assistance into a hands-free cellular system. The product includes a PC memory card with preprogrammed city information.

### GPS could help 911 problems

By Linda Kay Sakelaris

Plugging a Global Positioning System receiver alone into a wireless phone won't solve the problem faced by 911 emergency operators receiving distress calls from cellular users.

"There's no one solution," said Bob Montgomery, network manager for the Cellular Telecommunications Industry Association.

There are several location technologies that may be complimentary. Carriers are looking for the technology that suits their environment," Montgomery said. GPS doesn't work in buildings or in tunnels, but it may be the right solution for some terrain, he said.

A coalition of 911-emergency associations asked the wireless industry to create standards that would solve the problem of emergency calls coming from cellular users who don't know their location. Landline, local phone networks are connected to the 911 emergency system in most U.S. metropolitan cities, so dispatchers immediately know the location of the phone being used in distress situations.

Not so with cellular phones. When wireless phones are turned on, they connect with the nearest cell site, which may not be in the county with the nearest emergency team, Montgomery said. Some callers know exactly where they are; some callers are lost or uncertain.

"The PSAP (Public Safety Answering Point) doesn't know where you are and doesn't know your phone number to call you back," Montgomery said.

GPS in a phone could be of some help because it can provide specific location coordinates, but it is likely that several technologies will be used together to solve this problem. Other location technologies being considered include time difference of arrival and direction of signal.

"You build a standard and then apply technology to that. You have to look at the big picture every time," Montgomery said

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing "Reply Comments of the Ad Hoc Alliance for Public Access to 911 Opposing Certain Provisions of the Consensus Agreement" were served this 12th day of March, 1996, by first class mail, postage prepaid, on the parties of the attached list.

fills. Straus

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